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Two additional practices which EPA staff discussed with state staff recently, are prescribed grazing for pasture and manure incorporation for hay fields. These practices were not simulated in the scenario tool, and at least the latter practice could achieve significant additional P reductions. There is mention of the practice under the nutrient management category, but no

clear commitment to widespread implementation. Another additional practice that could have significant P reduction benefits (even though they are difficult to quantify at present) is controlled tile drainage. This topic is mentioned on p. 76, but there is no strong commitment to implementing this practice. These are examples of opportunities for additional P reductions in the Gap Watersheds and given how difficult it will be to achieve necessary reductions in these watersheds, consideration should be given to making these practices requirements.

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